

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 16 CR 793
v.)	
)	Judge Andrea R. Wood
MICHAEL PERSAUD)	

**MOTION OF THE UNITED STATES FOR ENTRY OF A
PRELIMINARY ORDER OF ABANDONMENT**

The UNITED STATES OF AMERICA, through JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for entry of a preliminary order of abandonment pursuant to Title 28, United States Code, Section 1651 and Title 41, Code of Federal Regulations, Section 128-48.1, and in support thereof submits the following:

1. On December 8, 2016, an indictment was returned charging defendant Michael Persaud with wire fraud, in violation of 18 U.S.C. § 1343.

2. During the investigation that led to the indictment in this case, law enforcement officers seized the following ("subject property"):

- a) a MacBook Air, model A1369, S/N: C02H60GCDRQ4, with power supply;
- b) a Dell Studio XPS, model PP35L, S/N: 21F18J1 with power supply;
- c) an iMac, model A1419, S/N: D25N601YFLHH, with keyboard, mouse, and notepad; and
- d) a Dell Studio XPS, model 8000se, S/N: GR6YDK1.

3. On June 25, 2021, an agreement to defer prosecution was entered for twelve months for the purpose of allowing defendant Michael Persaud to demonstrate his good conduct during this period.

4. On June 30, 2022, the defendant successfully completed a one-year period of conditions pursuant to a Deferred Prosecution Agreement, including payment of restitution. As a result, on that date, this Court entered an order of dismissal.

4. Pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, the government requests the entry of a preliminary order of abandonment directing the United States to dispose of the subject property. Further, pursuant to the provisions of 41 C.F.R. § 128-48.102-1, the United States shall publish notice of this order on an official government website which shall provide notice of its intent to dispose of the subject property according to law. The government shall hold the forgoing property for a period of 30 days from the date of the first publication of notice. Upon the expiration of the 30-day notice period, title to such property shall vest in the United States.

5. Following the Court's disposition of all third-party interests, the Court, if appropriate, shall declare the subject property abandoned which shall vest clear title in the United States of America.

WHEREFORE, pursuant to the provisions of 28 U.S.C. § 1651 and 41 C.F.R. § 128-48.1, the United States requests that this Court enter a preliminary order of abandonment as to the subject property.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

/s/ SMecklenburg

By:

SHERI H. MECKLENBURG
Assistant United States Attorney
219 S. Dearborn Street, 5th Floor
Chicago, Illinois 60604
(312) 353-5300